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May 17, 2002

William Caton
Acting Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

*RE: Application by Verizon-New Jersey for Authorization To Provide In-Region,
InterLATA Services in the State of New Jersey, WC Docket No. 02-67*

Dear Mr. Caton:

Enclosed herewith please find a supplemental declaration reflecting the MetTel – Verizon reconciliation of Missing Notifier Trouble Tickets.

Sincerely,

Jonathan Bertram

Cc:
FCC Staff
Verizon

Attachments
(All Non Redacted and Confidential)
As Stated Above

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Application by Verizon New Jersey Inc.,)	
Bell Atlantic Communications, Inc. (d/b/a Verizon)	WC Docket No. 02-67
Long Distance) NYNEX Long Distance)	
Company (d/b/a Verizon Enterprise Solutions),)	
Verizon Global Networks Inc., and Verizon)	
Select Services Inc., for Authorization To Provide)	
In-Region, InterLATA Services in New Jersey)	

SUPPLEMENTAL DECLARATION

MetTel has met with Verizon to refine the data presented to the commission on the subject of Missing Notifier Trouble Tickets. Over the course of several meetings, PONs were reviewed, response dates were analyzed, closure dates were coordinated and procedures were defined. Further, areas of final disagreement were defined and an additional round of data exchange was agreed upon.

The accompanying charts reflect the methodology agreed upon in a series of MetTel-Verizon meetings. As such, they supplement OSS Issues Charts 12 & 13 of MetTel's April 12, 2002 Ex Parte Presentation. Missing Notifier Trouble Ticket resolution within the 3 Business Day standard of FCC Consent Decree 00-92 is 87.66% in New Jersey. While the Verizon – MetTel meetings focused on New Jersey, MetTel applied the same methodology to Missing Notifier Trouble Tickets opened for NY and PA PONs since they are all processed in the same department. In New York, the 3 Business Day percentage resolved is 72.66% and in Pennsylvania it is 64.29%. These results, while improved, are all below the performance standards defined in FCC Consent Decree 00-92. The time to reach 95% resolution in New Jersey is reconciled to 10 Business Days. This is an improvement that approaches the standard but does not meet it. Comparatively, the time to reach 95% for New York is 49 days and is 84 days for Pennsylvania.

MetTel and Verizon have jointly agreed to examine the March-April Missing Notifier Trouble Ticket data and those results of the reconciliation will be forwarded to the Commission. At this time, MetTel believes the analysis will be complete and sent within a week.

On the subject of agreement to disagree, Verizon continues to maintain that the identification of the last notifier actually sent to MetTel satisfies the status provision requirement. MetTel holds to a literal reading of the Consent Decree where the phrase "current status" is specifically noted. MetTel has noted that almost 100% of PONs are actually completed prior to the initiation of the Trouble Ticket so that the response in those cases should not be confirmed when, in fact, the status should be provisioning or billing completed or provisioning completed when the PON has been billing completed.

Verizon's failure to properly track the true work status of PONs and choice to rely on the identification of the last notifier they transmitted does not permit them to ignore the terms of the consent decree. Neither does it permit them to unilaterally redefine the terms of the consent decree.

Elliot M. Goldberg